



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MA. 02109-3812

April 24, 2019

Mr. Robert Simeone  
BRAC Environmental Coordinator  
U.S. Army BRAC Environmental Office  
30 Quebec Street, Box 100  
Devens, MA 01434

Re: EPA Comments – March 2019 Time-Critical Removal Action Memorandum  
Former Fort Devens Administrative Record

Dear Mr. Simeone:

The U.S. Environmental Protection Agency (EPA) has been working with the U.S. Department of Defense (DOD) and Army to address perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA) contamination at the former Fort Devens. Last year, the Army commenced a Remedial Investigation (RI) at 14 sites within the former Fort Devens, in accordance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), the National Contingency Plan (NCP) and the Devens Federal Facility Agreement (FFA). Although the investigation of source areas and delineation of the PFOS/PFOA contamination is still underway, results of groundwater sampling performed in an area adjacent to the Town of Ayer's Grove Pond public water supply wells revealed the presence of PFOS and/or PFOA. Army agreed, based on the data collected to date, that the PFOS and/or PFOA detections in groundwater were likely attributable to military operations at the former Fort Devens and that this contaminated groundwater is moving toward the Town of Ayer's Grove Pond wellfield. Army has determined, as the lead CERCLA agency, that a Time-Critical Removal Action (TCRA) is warranted to mitigate unacceptable human health risks posed by PFOS/PFOA in groundwater emanating from the former Fort Devens towards a public drinking water supply. EPA offers the following comments in support of Army's decision and to confirm Army's commitment to address PFOA and PFOS contamination affecting drinking water supplies in Ayer.

EPA supports actions outlined in the TCRA Memorandum. Specifically, Army identified that it continues to work with the Town of Ayer to finalize an Environmental Services Cooperative Agreement (ESCA) to fund the construction, implementation and long-term operation and maintenance of a treatment system that can effectively and consistently attain the required treatment goals and restore the Town's ability to meet its drinking water demands; EPA urges Army and Ayer to proceed as expeditiously as possible. Army's removal action also includes mitigation of continued discharges from well #8 into Grove Pond until the permanent PFOS/PFOA treatment system is installed.

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Once again, EPA recognizes and supports Army's response to impacts resulting from the presence of PFOS and PFOA in the Town of Ayer's Grove Pond drinking water supply wells. EPA further supports Army's ongoing investigation of source areas and delineation of the PFOS/PFOA contamination at the former Fort Devens and continued coordination with EPA. EPA recognizes that part of the investigation is focused on areas of contamination near the MassDevelopment/Devens MacPherson well and urges Army to take appropriate action as needed. Should you have any questions or concerns regarding the above, please do not hesitate to contact Anni Loughlin at (617) 918-1273 or me at (617) 918-1393.

Sincerely,



Carol A. Keating

Federal Facilities Superfund Section

Office of Site Remediation and Restoration

cc: John Tesner, Army  
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